

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BERNADEAN RITTMANN *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC. and AMAZON
LOGISTICS, INC.,

Defendants.

No. 2:16-cv-1554-JCC

**JOINT STIPULATION TO EXTEND
DEADLINES RELATED TO THE
ISSUANCE OF NOTICE TO THE FLSA
COLLECTIVE, THE CLASS
CERTIFICATION MOTION, AND THE
RENEWED MOTION TO COMPEL
ARBITRATION; [PROPOSED] ORDER**

NOTE ON MOTION CALENDAR:
March 26, 2025

JOINT STIPULATION TO EXTEND DEADLINES RE:
ISSUANCE OF FLSA NOTICE, CLASS
CERTIFICATION, RENEWED MOTION TO COMPEL
ARBITRATION; [PROPOSED] ORDER

No. 2:16-cv-1554-JCC

STIPULATION

Plaintiffs and Defendants Amazon.com, Inc. and Amazon Logistics, Inc. (“Defendants”), by and through their undersigned counsel of record, hereby stipulate and request that the Court extend the deadlines related to the issuance of notice to the FLSA Collective, Plaintiffs’ forthcoming motion for class certification, and Defendants’ forthcoming renewed motion to compel arbitration.

On December 2, 2024, the Court issued an order granting Plaintiffs’ motion for conditional certification under the FLSA. ECF 381 at 12.

On December 9, 2024, Defendants filed a motion to certify the Court’s conditional certification order for interlocutory appeal under 28 U.S.C. § 1292(b). ECF 391. The Court denied the motion on January 29, 2025. ECF 406.

The Court’s January 29, 2025 order triggered the deadlines for the issuance of FLSA notice, Plaintiffs’ motion for class certification, and Defendants’ renewed motion to compel arbitration. ECF 393. The deadline for the issuance of FLSA notice was set for February 28, 2025. Plaintiffs’ deadline to file their motion for class certification and Defendants’ deadline to file their renewed motion to compel arbitration was set for March 17, 2025. Defendants’ deadline to file their opposition to Plaintiffs’ motion for class certification was set for May 16, 2025, and Plaintiffs’ deadline to file their reply was set for June 6, 2025.

On January 31, 2025, Plaintiffs and Defendants filed their proposed forms of FLSA notice, which are pending the Court’s approval. ECF 407-1 and ECF 407-2.

On February 28, 2025, the Court granted the parties’ joint stipulation to extend all deadlines by 30 days. ECF 417. Accordingly, the deadline for the issuance of FLSA notice was extended to March 30, 2025. Plaintiffs’ deadline to file their motion for class certification and Defendants’ deadline to file their renewed motion to compel arbitration was extended to April 16, 2025. Defendants’ deadline to file their opposition to Plaintiffs’ motion for class certification was extended to June 16, 2025, and Plaintiffs’ deadline to file their reply was extended to July 7, 2025.

JOINT STIPULATION TO EXTEND DEADLINES RE:
ISSUANCE OF FLSA NOTICE, CLASS
CERTIFICATION, RENEWED MOTION TO COMPEL
ARBITRATION; [PROPOSED] ORDER

1 The parties have met and conferred, and agree that a further extension is required to issue
2 the FLSA notice. Plaintiffs' counsel anticipates that it will require 14 days to facilitate the
3 administration of issuing the notice after the Court approves the form of the notice. The parties
4 also agree that further extensions to the briefing schedule for Plaintiffs' motion for class
5 certification and the deadline for Defendants' renewed motion to compel arbitration are also
6 appropriate.

7 The Parties therefore stipulate to the following:

- 8 1. The date by which FLSA notice shall be issued is extended to 14 days following the
9 Court's ruling on the form of notice, but no earlier than April 29, 2025.
- 10 2. The deadline for Plaintiffs to file their motion for class certification and for Defendants
11 to file their renewed motion to compel arbitration is extended by 30 days, to May 16,
12 2025.
- 13 3. The deadline for the parties to respond to these motions shall be July 16, 2025.
- 14 4. The deadline for the parties to file reply briefs shall be August 6, 2025.

15
16 Stipulated by and between the parties through their counsel of record:
17
18
19
20
21
22
23
24
25
26
27
28

JOINT STIPULATION TO EXTEND DEADLINES RE:
ISSUANCE OF FLSA NOTICE, CLASS
CERTIFICATION, RENEWED MOTION TO COMPEL
ARBITRATION; [PROPOSED] ORDER

Dated: March 26, 2025

By: s/ Shannon Liss-Riordan

Shannon Liss-Riordan (*pro hac vice*)
Harold L. Lichten (*pro hac vice*)
Jeremy Abay (*pro hac vice*)
LICHTEN & LISS-RIORDAN, P.C.
729 Boylston Street, Suite 2000
Boston, MA 02116
(617) 994-5800
sliss@llrlaw.com
hlichten@llrlaw.com
jabay@llrlaw.com

Michael C. Subit, WSBA No. 29189
FRANK FREED SUBIT & THOMAS LLP
705 Second Avenue, Suite 1200
Seattle, WA 98104
(206) 682-6711
msubit@frankfreed.com

Attorneys for Rittmann Plaintiffs

Dated: March 26, 2025

GIBSON, DUNN & CRUTCHER LLP

By: s/ Megan Cooney

Megan Cooney, *Admitted Pro Hac Vice*
3161 Michelson Drive, Suite 1200
Irvine, CA 92612-4412
+1 949.451.3800
mcooney@gibsondunn.com

Jason C. Schwartz, *Admitted Pro Hac Vice*
Lucas C. Townsend, *Admitted Pro Hac Vice*
Dhananjay S. Manthripragada, *Admitted Pro Hac Vice*
1700 M Street, N.W.
Washington, D.C. 20036-4504
+1 202.955.8500
jschwartz@gibsondunn.com
ltownsend@gibsondunn.com
dmanthripragada@gibsondunn.com

JOINT STIPULATION TO EXTEND DEADLINES RE:
ISSUANCE OF FLSA NOTICE, CLASS
CERTIFICATION, RENEWED MOTION TO COMPEL
ARBITRATION; [PROPOSED] ORDER

MORGAN, LEWIS & BOCKIUS LLP

By: s/ Andrew DeCarlow

Andrew DeCarlow, WSBA No. 54471
1301 Second Avenue, Suite 3000
Seattle, WA 98101
+1 206.274.0154
andrew.decarlow@morganlewis.com

Richard G. Rosenblatt, *Admitted Pro Hac Vice*
James P. Walsh, Jr., *Admitted Pro Hac Vice*
502 Carnegie Center
Princeton, NJ 08540
richard.rosenblatt@morganlewis.com
james.walsh@morganlewis.com

Sarah Zenewicz, *Admitted Pro Hac Vice*
One Market Spear Street Tower
San Francisco, CA 94105
sarah.zenewicz@morganlewis.com

Attorneys for Defendants
Amazon.com, Inc. and Amazon Logistics, Inc.

JOINT STIPULATION TO EXTEND DEADLINES RE:
ISSUANCE OF FLSA NOTICE, CLASS
CERTIFICATION, RENEWED MOTION TO COMPEL
ARBITRATION; [PROPOSED] ORDER

[PROPOSED] ORDER

IT IS SO ORDERED.

DATED this _____ day of _____ 2025.

The Honorable John C. Coughenour

Presented by:

Dated: March 26, 2025

By: s/ Shannon Liss-Riordan

Shannon Liss-Riordan (*pro hac vice*)
Harold L. Lichten (*pro hac vice*)
Jeremy Abay (*pro hac vice*)
LICHTEN & LISS-RIORDAN, P.C.
729 Boylston Street, Suite 2000
Boston, MA 02116
(617) 994-5800
sliss@llrlaw.com
hlichten@llrlaw.com
jabay@llrlaw.com

Michael C. Subit, WSBA No. 29189
FRANK FREED SUBIT & THOMAS LLP
705 Second Avenue, Suite 1200
Seattle, WA 98104
(206) 682-6711
msubit@frankfreed.com

Attorneys for Rittmann Plaintiffs

Dated: March 26, 2025

GIBSON, DUNN & CRUTCHER LLP

By: s/ Megan Cooney

Megan Cooney, *Admitted Pro Hac Vice*
3161 Michelson Drive, Suite 1200
Irvine, CA 92612-4412
+1 949.451.3800

JOINT STIPULATION TO EXTEND DEADLINES RE:
ISSUANCE OF FLSA NOTICE, CLASS
CERTIFICATION, RENEWED MOTION TO COMPEL
ARBITRATION; [PROPOSED] ORDER

mcooney@gibsondunn.com

Jason C. Schwartz, *Admitted Pro Hac Vice*
Lucas C. Townsend, *Admitted Pro Hac Vice*
Dhananjay S. Manthripragada, *Admitted Pro Hac Vice*
1700 M Street, N.W.
Washington, D.C. 20036-4504
+1 202.955.8500
jschwartz@gibsondunn.com
ltownsend@gibsondunn.com
dmanthripragada@gibsondunn.com

MORGAN, LEWIS & BOCKIUS LLP

By: s/ Andrew DeCarlow

Andrew DeCarlow, WSBA No. 54471
1301 Second Avenue, Suite 3000
Seattle, WA 98101
+1 206.274.0154
andrew.decarlow@morganlewis.com

Richard G. Rosenblatt, *Admitted Pro Hac Vice*
James P. Walsh, Jr., *Admitted Pro Hac Vice*
502 Carnegie Center
Princeton, NJ 08540
richard.rosenblatt@morganlewis.com
james.walsh@morganlewis.com

Sarah Zenewicz, *Admitted Pro Hac Vice*
One Market Spear Street Tower
San Francisco, CA 94105
sarah.zenewicz@morganlewis.com

Attorneys for Defendants
Amazon.com, Inc. and Amazon Logistics, Inc.

JOINT STIPULATION TO EXTEND DEADLINES RE:
ISSUANCE OF FLSA NOTICE, CLASS
CERTIFICATION, RENEWED MOTION TO COMPEL
ARBITRATION; [PROPOSED] ORDER